

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 20-30060

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

YESICA LARA ROSE,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense(s) to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3).

On or about between the 29th day of July, 2018, and the 11th day of September, 2018, in Dewey County, Corson County, and Ziebach County, in Indian country, in the District of South Dakota, the defendant, Yessica Rose Lara, an Indian, did unlawfully take and carry away with intent to steal and purloin the personal property of another, Lakota Thrifty Mart, Grand River Casino, Country Market, Timber Lake Service Station, Cenex Gas Station, to wit: proceeds from checks written on the checking accounts of Western Dakota Bank, State Bank of Eagle Butte, and Chase Bank, with a value more than \$1000, in violation of 18 U.S.C. §§ 1153 and 661.

On July 29, 2018, the Defendant forged a check made payable to Lakota Thrifty Mart for \$100.00. The check came from a Western Dakota Bank account previously belonging to Shirley Eagle Dog, but was closed. The Defendant cashed

the check at the Lakota Thrifty Mart later that day.

On August 3, 2018, the Defendant forged a check made payable to herself from the Si Tanka University in the amount of \$756.86. Si Tanka University, an accredited college owned by the Cheyenne River Sioux Tribe, closed and filed for bankruptcy in 2006. The Defendant cashed the check at the Grand River Casino later that day.

On August 23, 2018, the Defendant forged another Si Tanka University check made payable to herself in the amount of \$856.32. She cashed the check at the Country Market in Timber Lake, South Dakota, later that day.

The same day, the Defendant forged an additional check from Si Tanka University made payable to herself in the amount of \$286.24. The Defendant cashed the check at the Timber Lake Service Station in Timber Lake, South Dakota.

On September 4, 2018, the Defendant forged another Si Tanka University check made payable to herself for \$356.98. The Defendant attempted to cash this check at the Cenex gas station in Dupree, South Dakota. However, the store clerk believed the check looked forged and called law enforcement. The Defendant was arrested for attempting to cash a forged check.

On September 11, 2018, the Defendant forged a check from a nonexistent account at Chase Bank. The Defendant wrote her personal information on the upper left portion of the check where the payer's information is generally printed. The Defendant cashed the check in the amount of \$120.00 at the Lakota Thrifty Mart, in Eagle Butte, South Dakota.


The total dollar amount of the checks Lara cashed or attempted to cash, from July 29, 2018, through September 11, 2018, totals \$2,476.40.

Date	Check Amount	Check Number	Payer	Payee	Cashed At
7/29/2018	\$100.00	1341	Shirley Dog Eagle	Lakota Thrifty Mart	Lakota Thrifty Mart
8/3/2018	\$756.86	35732	Si Tanka University	Yessica R Lara	Grand River Casino
8/23/2018	\$856.32	35738	Si Tanka University	Yessica R Lara	Country Market
8/23/2018	\$286.24	35737	Si Tanka University	Yessica Lara	Timber Lake Service Station
9/4/2018	\$356.98	33283	Si Tanka University	Yessica Lara	Cenex Gas Station
9/11/2018	\$120.00	9993	Yessica Lara	Lakota Thrifty Mart	Lakota Thrifty Mart

Yesica Lara is an enrolled member of the Cheyenne River Sioux Tribe with enrollment number CRU 018092 and 3/8 blood quantum. Eagle Butte, Timber Lake, Dupree, and the Grand River Casino are within the exterior boundaries of the Cheyenne River and Standing Rock Reservations, federally recognized tribes.

RONALD A. PARSONS, JR.
United States Attorney

3/24/2020
Date


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4-24-20

Date

Yessica Lara

Yessica Lara Rose

Defendant

4/17/2020

Date

Jana Miner

Jana Miner

Attorney for Defendant